

Peterson v. Murrow's Transfer, Inc., et al.
Civ. A. No. 23-136 (W.D. Pa.) (CCW)

SECOND AMENDED JOINT EXHIBIT LIST OF
FELDMAN SHEPHERD AND PLAINTIFF

Ex.	Date and Time	Author(s)	Type of Document	Objection to Authenticity	Response to Objection	Objection to Admissibility	Response to Objection
FS-1	1/5/21 12:00 AM	Feldman Shepherd	CFA - Fully Signed	None	None	None	None
FS-2	1/8/21 12:00 AM	Alan M. Feldman	Letter	None	None	None	None
FS-3	3/4/21 12:00 AM	Daniel J. Mann	Letter	None	None	None	None
FS-4	3/4/21 5:46 PM	Edward S. Goldis, Kristen Behrens, Daniel J. Mann	Email Chain	None	None	None	None
FS-5	3/23/21 10:49 AM	Daniel J. Mann	Email (w/attach)	None	None	None	None
FS-6	3/23/21 12:00 AM	Daniel J. Mann	Letter	None	None	None	None
FS-7	3/29/21 3:33 PM	Daniel J. Mann, Edward S. Goldis, Mary Sutton	Email Chain (w/attach)	None	None	None	None
FS-8	4/7/21 12:26 PM	Daniel J. Mann	Email	None	None	None	None
FS-9	5/4/21 9:32 AM	Daniel J. Mann, Kristen Behrens	Email Chain	None	None	None	None
FS-10	5/5/21 9:15 AM	Daniel J. Mann, James Girman, Edward S. Goldis	Email Chain	None	None	None	None
FS-11	5/5/21 2:11 PM	Daniel J. Mann	Outlook Task	None	None	None	None
FS-12	5/5/21 11:07 AM	Daniel J. Mann, Alan M. Feldman	Email Chain	None	None	None	None
FS-13	5/5/21 5:51 PM	Daniel J. Mann	Email (w/attach)	None	None	None	None
FS-14	5/14/21 12:33 PM	Edward Koerper, Daniel J. Mann	Email Chain (w/attach)	None	None	None	None
FS-15	6/9/21 7:02 AM	Daniel J. Mann	Email	None	None	None	None
FS-16	6/9/21 7:34 PM	Sheila Peterson, Daniel J. Mann	Email Chain	None	None	None	None
FS-17	6/9/21 8:10 PM	Daniel J. Mann, Sheila Peterson	Email Chain	None	None	None	None
FS-18	6/14/21 2:45 PM	Daniel J. Mann, Sheila Peterson	Email Chain	None	None	None	None
FS-19	8/11/21 12:00 AM	John W. Peck, District Attorney	Letter	None	None	None	None
FS-20	9/8/21 5:15 PM	Edward S. Goldis	Email (w/attach)	None	None	None	None
FS-21	9/27/21 11:10 AM	Daniel J. Mann, Jenna L. Hough, Edward S. Goldis	Email Chain	None	None	None	None
FS-22	10/22/21 12:44 PM	Sheila Peterson	Email	None	None	None	None
FS-23	10/22/21 2:57 PM	Daniel J. Mann, Wanda Nesmith, Sheila Peterson	Email Chain	None	None	None	None
FS-24	10/25/21 11:13 AM	Daniel J. Mann, Wanda Nesmith, Sheila Peterson	Email Chain	None	None	None	None
FS-25	10/25/21 12:16 PM	Sheila Peterson, Daniel J. Mann, Wanda Nesmith	Email Chain	None	None	None	None
FS-26	10/25/21 1:11 PM	Daniel J. Mann, Sheila Peterson, Wanda Nesmith	Email Chain	None	None	None	None
FS-27	10/25/21 2:54 PM	Daniel J. Mann, Edward S. Goldis, Sheila Peterson	Email Chain	None	None	None	None
FS-28	11/11/21 10:48 AM	Daniel J. Mann, Edward S. Goldis	Email Chain	None	None	None	None

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Ex.	Date and Time	Author(s)	Type of Document	Objection to Authenticity	Response to Objection	Objection to Admissibility	Response to Objection
FS-29	11/17/21 10:09 AM	Daniel J. Mann, Edward Koerper, Edward S. Goldis	Email Chain	None	None	None	None
FS-30	1/28/22 12:00 AM	Edward S. Goldis	Letter	None	None	None	None
FS-31	9/11/22 8:40 PM	Daniel J. Mann, Alan M. Feldman, Edward S. Goldis	Email Chain	None	None	None	None
FS-32	11/1/22 12:00 AM	Orlowski and Associates	Asset Search Report	None	None	None	None
FS-33	11/1/22 12:00 AM	Orlowski and Associates	Invoice for Asset Report	None	None	None	None
FS-34	11/1/22 11:12 AM	Daniel J. Mann	Email (w/attach)	None	None	None	None
FS-35	11/1/22 11:39 AM	Jenna L. Hough, Daniel J. Mann	Email Chain	None	None	None	None
FS-36	11/1/22 4:37 PM	David Orlowski	Email	None	None	None	None
FS-37	11/2/22 4:52 PM	Daniel J. Mann, Jenna L. Hough	Email Chain	None	None	None	None
FS-38	12/13/22 12:00 AM	Edward S. Goldis	Letter	None	None	None	None
FS-39	12/13/22 3:27 PM	Cheryl Herling	Email (w/attach)	None	None	None	None
FS-40	12/14/22 1:32 PM	Daniel J. Mann, Edward S. Goldis	Email Chain	None	None	None	None
FS-41	12/20/22 3:07 PM	Sheila Peterson	Email	None	None	None	None
FS-42	1/9/23 12:00 AM	Edward S. Goldis	Letter	None	None	None	None
FS-43	2/13/23 12:31 PM	Daniel J. Mann	Email	None	None	None	None
FS-44	2/13/23 12:36 PM	Daniel J. Mann, Alan M. Feldman	Email Chain	None	None	None	None
FS-45	2/17/23 1:35 PM	Edward S. Goldis	Email	None	None	None	None
FS-46	2/17/23 11:29 AM	Daniel J. Mann, Cheryl Herling	Email Chain	None	None	None	None
FS-47	2/17/23 2:35 PM	Daniel J. Mann, Edward S. Goldis	Email Chain	None	None	None	None
FS-48	3/4/23 12:55 AM	Daniel J. Mann	Email	None	None	None	None
FS-49	3/7/23 12:00 AM	Daniel J. Mann	Draft Letter	None	None	None	None
FS-50	3/7/23 3:52 PM	Daniel J. Mann	Email	None	None	None	None
FS-51	3/7/23 3:52 PM	Daniel J. Mann	Email	None	None	None	None
FS-52	3/10/23 5:01 PM	FS File Room, Theresa Perri	Email Chain	None	None	None	None
FS-53	3/10/23 12:00 AM	Daniel J. Mann	Letter	None	None	None	None
FS-54	3/10/23 4:59 PM	Theresa Perri	Email (w/attach)	None	None	None	None
FS-55	3/9/23 12:00 AM	Mark A. Martini	Letter	None	None	None	None
FS-56	3/14/23 12:00 AM	Edward Goldis	Letter	None	None	None	None
FS-57	3/22/23 12:00 AM	Jenna L. Hough	Letter	None	None	None	None
FS-58	3/22/23 7:04 PM	Jenna L. Hough, Daniel J. Mann	Email Chain	None	None	None	None
FS-59	3/22/23 4:17 PM	Jenna L. Hough	Email (w/attach)	None	None	None	None
FS-60	3/31/23 12:00 AM	Jenna L. Hough	Letter	None	None	None	None
FS-61	3/31/23 1:33 PM	Jenna L. Hough	Email (w/attach)	None	None	None	None
FS-62	4/2/23 9:17 AM	Daniel J. Mann, Edward S. Goldis	Email Chain	None	None	None	None
FS-63	4/12/23 3:49 PM	Daniel J. Mann	Outlook Task	None	None	None	None

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FS-64	4/14/23 10:50 AM	Daniel J. Mann	Email	None	None	None	None
FS-65	4/18/23 1:19 PM	Daniel J. Mann, Edward S. Goldis	Email Chain	None	None	None	None
FS-66	4/19/23 3:57 PM	Daniel J. Mann, Edward S. Goldis	Email Chain	None	None	None	None
FS-67	4/21/23 5:51 PM	Daniel J. Mann, Edward S. Goldis	Email Chain	None	None	None	None
FS-68	5/31/23 12:00 AM	Daniel J. Mann	Letter	None	None	None	None
FS-69	5/31/23 12:00 AM	Edward S. Goldis	Letter	None	None	None	None
FS-70	5/31/23 4:49 PM	Daniel J. Mann	Email (w/attach)	None	None	None	None
FS-71	6/1/23 8:10 AM	Theresa Perri, Daniel J. Mann	Email Chain	None	None	None	None
FS-72	6/1/23 5:27 PM	Mail Delivery System	Email	None	None	None	None
FS-73	6/5/23 7:55 PM	Daniel J. Mann	Outlook Task	None	None	None	None
FS-74	6/12/23 12:00 AM	PA Department of Revenue	Letter	None	None	None	None
FS-75	6/30/23 5:54 PM	Mail Delivery System	Email	None	None	None	None
FS-76	7/25/23 12:00 AM	Alan M. Feldman	Letter	None	None	None	None
FS-77	7/25/23 3:45 PM	Cheryl Herling	Email (w/attach)	None	None	None	None
FS-78	7/25/23 7:55 PM	FS File Room	FedEx Label	None	None	None	None
FS-79	7/26/23 5:17 PM	Cheryl Herling	Email (w/attach)	None	None	None	None
FS-80	7/27/23 12:00 AM	Alan M. Feldman	Letter	None	None	None	None
FS-81	7/27/23 7:25 PM	Cheryl Herling	Email (w/attach)	None	None	None	None
FS-82	8/4/23 11:00 PM	Sheila Peterson	Email	None	None	None	None
FS-83	8/5/23 8:33 AM	Edward S. Goldis, Daniel J. Mann, Sheila Peterson	Email Chain	None	None	None	None
FS-84	8/7/23 8:41 AM	Sheila Peterson	Email	None	None	None	None
FS-85	8/8/23 5:56 PM	Alan M. Feldman	Email	None	None	None	None
FS-86	8/8/23 7:37 PM	Sheila Peterson, Alan M. Feldman	Email Chain	None	None	None	None
FS-87	8/10/23 8:41 AM	Mark A. Martini, Edward S. Goldis	Email Chain	None	None	None	None
FS-88	8/10/23 1:29 PM	Sheila Peterson	Email	None	None	None	None
FS-89	8/10/23 2:31 PM	Daniel J. Mann, Sheila Peterson	Email Chain	None	None	None	None
FS-90	8/10/23 2:53 PM	Sheila Peterson, Daniel J. Mann	Email Chain	None	None	None	None
FS-91	8/10/23 2:58 PM	Daniel J. Mann, Sheila Peterson	Email Chain	None	None	None	None
FS-92	8/10/23 3:13 PM	Sheila Peterson, Daniel J. Mann	Email Chain	None	None	None	None
FS-93	8/10/23 3:38 PM	Sheila Peterson	Email	None	None	None	None
FS-94	8/10/23 3:43 PM	Daniel J. Mann, Sheila Peterson	Email Chain	None	None	None	None
FS-95	8/10/23 3:43 PM	Sheila Peterson	Email	None	None	None	None
FS-96	8/10/23 12:00 AM	Edward S. Goldis	Memo	None	None	None	None
FS-97	8/10/23 4:12 PM	Daniel J. Mann, Sheila Peterson	Email Chain	None	None	None	None
FS-98	8/10/23 4:38 PM	Sheila Peterson, Daniel J. Mann	Email Chain	None	None	None	None
FS-99	8/10/23 4:57 PM	Daniel J. Mann, Sheila Peterson	Email Chain	None	None	None	None

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FS-100	8/10/23 5:18 PM	Sheila Peterson, Daniel J. Mann	Email Chain	None	None	None	None
FS-101	8/10/23 5:35 PM	Daniel J. Mann, Sheila Peterson	Email Chain	None	None	None	None
FS-102	8/10/23 7:09 PM	Sheila Peterson	Email	None	None	None	None
FS-103	8/10/23 9:30 PM	Sheila Peterson	Email	None	None	None	None
FS-104	8/10/23 10:13 PM	Daniel J. Mann, Sheila Peterson	Email Chain	None	None	None	None
FS-105	8/11/23 8:25 AM	Alan M. Feldman, Edward S. Goldis, James Girman	Email Chain	None	None	None	None
FS-106	8/11/23 10:33 AM	Edward S. Goldis, James Girman, Chambers	Email Chain	None	None	None	None
FS-107	8/11/23 12:00 AM	Edward S. Goldis	Letter	None	None	None	None
FS-108	8/11/23 3:54 PM	Cheryl Herling	Email (w/attach)	None	None	None	None
FS-109	8/15/23 11:18 AM	Sheila Peterson	Email	None	None	None	None
FS-110	8/15/23 12:46 PM	Daniel J. Mann, Sheila Peterson	Email Chain	None	None	None	None
FS-111	8/15/23 1:03 PM	Daniel J. Mann, Sheila Peterson	Email Chain	None	None	None	None
FS-112	8/15/23 2:53 PM	Daniel J. Mann, Sheila Peterson	Email Chain	None	None	None	None
FS-113	8/15/23 2:56 PM	Daniel J. Mann, Theresa Perri	Email Chain	None	None	None	None
FS-114	8/20/23 4:40 PM	Sheila Peterson	Email	None	None	None	None
FS-115	March-July 2023	E. Goldis, D. Mann, B. Peterson	Text Messages	None	None	None	None
FS-116	May 2021-Aug. 2023	E. Goldis, D. Mann, S. Peterson, B. Peterson	Text Messages	None	None	None	None
FS-117	Jan. 2021-April 2023	E. Goldis, B. Peterson	Text Messages	None	None	None	None
FS-118	3/22/23 12:00 AM	Jenna L. Hough	Letter (w/encl)	None	None	None	None
FS-119	March 2021-March 2021	E. Goldis, D. Mann, A. Feldman, S. Peterson, B. Peterson	Text Messages	None	None	None	None
FS-120	Feb. 2023-March 2023	E. Goldis, D. Mann, B. Peterson	Text Messages	None	None	None	None
FS-121	March 2021-Jan. 2022	E. Goldis, S. Peterson	Text Messages	None	None	None	None
FS-122	5/2/23 12:00 AM	E. Goldis, J. Hough, B. Peterson	Text Messages	None	None	None	None
FS-123		Edward S. Goldis	Cell Phone Logs	None	None	None	None
FS-124		T-Mobile	Cell Phone Logs	None	None	None	None
FS-125		T-Mobile	Cell Phone Logs	None	None	None	None
FS-126		Feldman Shepherd	Office Phone Log	None	None	None	None
FS-127	12/19/23 12:00 AM	Sheila Peterson and Brook Peterson	Peterson Discovery Responses	None	None	None	None
FS-128	3/10/23 12:00 AM	Theresa Perri	Screenshot - Email (partial)	None	None	None	None
FS-129	6/12/23 12:00 AM	PA Department of Revenue	Screenshot - Letter (partial)	None	None	None	None
FS-130	3/10/23 12:00 AM	Daniel J. Mann	Screenshot - Letter (partial)	None	None	None	None
FS-131	4/28/23 12:00 AM	Jenna L. Hough	Screenshot - Text	None	None	None	None
FS-132	4/12/23 12:00 AM	Brook Peterson	Screenshot - Text	None	None	None	None
FS-133	Unknown	Jenna L. Hough	Screenshot - Email (partial)	None	None	None	None

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Ex.	Date and Time	Author(s)	Type of Document	Objection to Authenticity	Response to Objection	Objection to Admissibility	Response to Objection
FS-134	12/13/22 12:00 AM	Cheryl Herling	Screenshot - Email (partial)	None	None	None	None
FS-135	3/4/21 12:00 AM	Cheryl Herling	Screenshot - Email (partial)	None	None	None	None
FS-136	3/22/23 12:00 AM	Jenna L. Hough	Screenshot - Email (partial)	None	None	None	None
FS-137	8/15/23 12:00 AM	Sheila Peterson, Brook Peterson	Screenshot - Texts	None	None	None	None
FS-138	6/21/22 12:00 AM	Sheila Peterson, Brook Peterson	Screenshot - Texts	None	None	None	None
FS-139	2/8/23 12:00 AM	Sheila Peterson, Brook Peterson	Screenshot - Texts	None	None	None	None
FS-140	3/5/23 12:00 AM	Sheila Peterson, Brook Peterson	Screenshot - Texts	None	None	None	None
FS-141	3/5/23 12:00 AM	Sheila Peterson, Brook Peterson	Screenshot - Texts	None	None	None	None
FS-142	4/12/23 12:00 AM	Brook Peterson	Screenshot - Text	None	None	None	None
FS-143	4/12/23 12:00 AM	Brook Peterson	Screenshot - Texts (partial)	None	None	None	None
FS-144	4/25/23 12:00 AM	Sheila Peterson	Facebook Post	None	None	None	None
FS-145	8/10/23 12:00 AM	Sheila Peterson	Facebook Post	None	None	None	None
FS-146	1/3/21 12:00 AM	Alan Feldman, Sheila Peterson	Screenshot - Text	None	None	None	None
FS-147	1/4/21/-1/5/21	Alan Feldman, Sheila Peterson	Screenshot - Texts	None	None	None	None
FS-148	8/21/23 12:00 AM	Sheila Peterson	Affidavit	None	None	None	None
FS-149	October-23	Sheila Peterson	Affidavit	None	None	None	None
FS-150	10/17/23 12:00 AM	Brook Peterson	Affidavit	None	None	None	None
FS-151	12/13/23 12:00 AM	Ryan H. James	Report	None	None	None	None
FS-152	8/25/23 12:00 AM		Peterson Cell Logs - Modified by Goldleaf	None	None	None	None
FS-153	Dec 2022-March 2023	Cheryl Herling, Jenna L. Hough, Theresa Perri	Compilation of Screenshots of Emails in Sheila Peterson Gmail Account (partial)	None	None	None	None
FS-154	5/2/23 12:00 AM	Sheila Peterson	Facebook Post	None	None	None	None
FS-155	8/14/23 4:41 PM	Alan M. Feldman, Edward Ciarimboli	Email Chain	None	None	None	None

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Ex.	Date and Time	Author(s)	Type of Document	Objection to Authenticity	Response to Objection	Objection to Admissibility	Response to Objection
FS-500	Feldman Shepherd Client File - produced on 10/3/23			<p>Basis: FRE 901-902, 1001-1008..</p> <p>Argument: Reference to the Client File is overly broad and vague. Plaintiff reserves all objections to authenticity at time of hearing, and more generally objects to inclusion of any additional exhibits unless entered by agreement or leave of court.</p>	<p>Feldman Shepherd designated the client file that it produced to the Petersons on October 3, 2023 as a "catch-all" exhibit in the event that there are one or more documents in the file that may need to be introduced for purposes of rebuttal, impeachment or otherwise. This exhibit has appeared on Feldman Shepherd's exhibit list since it was first filed on January 14, 2024 and Plaintiff is raising this objection for the first time on January 22, 2024.</p>	<p>Basis: FRE 401-408, 501-502, 608, 801.</p> <p>Argument: Reference to the Client File is overly broad and vague. Plaintiff reserves all objections to admissibility at time of hearing, and more generally objects to inclusion of any additional exhibits unless entered by agreement or leave of court.</p>	<p>Feldman Shepherd designated the client file that it produced to the Petersons on October 3, 2023 as a "catch-all" exhibit in the event that there are one or more documents in the file that may need to be introduced for purposes of rebuttal, impeachment or otherwise. This exhibit has appeared on Feldman Shepherd's exhibit list since it wsa first filed on January 14, 2024 and Plaintiff is raising this objection for the first time on January 22, 2024.</p>

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FS-900	Feldman Shepherd Emails (including internal emails and attorney work product) - produced on 10/6/23			<p>Basis: FRE 901-902, 1001-1008..</p> <p>Argument: Reference to internal emails and attorney work product is overly broad and vague. Plaintiff reserves all objections to authenticity at time of hearing, and more generally objects to inclusion of any additional exhibits unless entered by agreement or leave of court.</p>	<p>Feldman Shepherd designated the client file that it produced to the Petersons on October 3, 2023 as a "catch-all" exhibit in the event that there are one or more documents in the file that may need to be introduced for purposes of rebuttal, impeachment or otherwise. This exhibit has appeared on Feldman Shepherd's exhibit list since it wsa first filed on January 14, 2024 and Plaintiff is raising this objection for the first time on January 22, 2024.</p>	<p>Basis: FRE 401-408, 501-502, 608, 801.</p> <p>Argument: Reference to internal emails and attorney work product is overly broad and vague. Plaintiff reserves all objections to admissibility at time of hearing, and more generally objects to inclusion of any additional exhibits unless entered by agreement or leave of court.</p>	<p>Feldman Shepherd designated the client file that it produced to the Petersons on October 3, 2023 as a "catch-all" exhibit in the event that there are one or more documents in the file that may need to be introduced for purposes of rebuttal, impeachment or otherwise. This exhibit has appeared on Feldman Shepherd's exhibit list since it was first filed on January 14, 2024 and Plaintiff is raising this objection for the first time on January 22, 2024.</p>
A	1/5/20 12:00 AM	Alan M. Shepherd, Brook Peterson, Sheila Peterson	Feldman Shepherd Contingent Fee Agreement	None	None	None	None
B	4/10/23 12:16 PM	Daniel J Mann, Edward S. Goldis	Text Messages	None	None	None	None
C	8/4/23 11:00 AM	Sheila Peterson	Email Chain	None	None	None	None

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D	11/22/21 12:00 AM	Daniel J. Mann	Letter - Renunciation and Death Certicicate	None	None	<p>Basis: FRE 401 and 402.</p> <p>Argument: Brook Peterson's renunciation and Brandon Peterson's death certificate are not relevant to the issues of (i) whether Feldman Shepherd had Sheila Peterson's express authority to send the policy limits demand letter to Defendants, (ii) whether Sheila Peterson ratified Feldman Shepherd's authority by not objecting to the demand letter or the settlement in a timely manner, or (iii) whether the Petersons are contractually obligated to pay a contingent fee to Feldman Shepherd that is equal to 37.5% of the net settlement proceeds recovered by Feldman Shepherd (\$2.6MM)(collectively, the "Issues to be Decided") and is, therefore, inadmissible.</p>	<p>Basis: F.R.E. 401,402,404,608.</p> <p>Argument: Disagreed, this document is probative as to who had authority to interact with Feldman Shepherd and on what matters; Brook Peterson signed the first representation agreement with Feldman Shepherd, but not the amended agreement signed by Allan Feldman. The estate was not created at the time of execution, Sheila Peterson was later appointed as administratrix, not Brook Peterson. Feldman Shepherd directed communications to Brook Peterson regarding Estate matters post renunciaation, and settlement athority matters. Additional issues of who had authority, to consent to FS, who communications should have been directed to, who could grant authority to settle, absense of mistatke, relates to showing Peterson's case argument as more probable and FS as less probable.</p>

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E	11/18/21 10:32 AM	Wanda Brown Nesmith, Daniel J. Mann, Edward S. Goldis	Email Chain	None	None	<p>Basis: FRE 401 and 402.</p> <p>Argument: Feldman Shepherd's internal emails from November 2021 regarding Sheila Peterson's visit to Feldman Shepherd's office, Sheila Peterson's delivery of Brandon Peterson's cell phone and chain of custody issues concerning the cell phone are not relevant to the Issues to be Decided and are, therefore, inadmissible.</p>	<p>Basis: F.R.E. 401,402,404,608.</p> <p>Argument: Disagreed, Feldman Shepherd identifies the Petersons as uncooperating clients; this email(s) relates to meetings with her whereby policies and facts were known to firm, but not relayed to client, which is probative to settlement, and relations regard settlement, fees, and ability to ratify agreement. Also, Mr. Mann and others in exhibit are a point of contact regarding infrequent in person, and otherwise communications, relates to important facts of consequence, communications and treatment of Petersons case, absense of mistake, relates to showing Peterson's case argument as more probable and FS as less probable.</p>

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Ex.	Date and Time	Author(s)	Type of Document	Objection to Authenticity	Response to Objection	Objection to Admissibility	Response to Objection
F	3/4/21 12:00 AM	Daniel J. Mann	Letter - Records Authorization	None	None	Basis: FRE 401 and 402. Argument: Daniel Mann's letter to Sheila Peterson in March 2021 enclosing six (6) blank authorizations for the release of Brandon Peterson's employment, academic and medical records and requesting that Sheila Peterson sign but not date the authorizations are not relevant to the Issues to be Decided and are, therefore, inadmissible.	Basis: F.R.E. 401,402,404, 608. Argument: Disagreed, this document is probative as to when signature(s) was/were obtained by firm, which stated valid for one year on date of signature, this same signature was later used post expiration without consent or knowledge of client on documents re. gov. entities stating settlement reached; whereby failure to communicate with client for updated signatures avoided options for settlement discussions, for express authority or ratification, approval, ratification matters; and document relates to signature request, authorizations, authority to settle, issue of consent or no consent, issue of client signature duplication to avoid client contacts or communication, valid consent issue, regarding requests to client as release request, absense of mistake, relates to important facts of consequence, communications and treatment of Petersons case relates to showing Peterson's case argument as more probable and FS as less probable.
G	4/10/23 12:16 AM	Daniel J Mann, Brook Peterson, Edward S. Goldis	Text Messages	None	None	None	None
H	1/18/21 2:05 PM	Ed Goldis, Brook Peterson	Text Messages	None	None	None	None
I	5/13/21 4:29 PM	Sheila Peterson, Daniel J. Mann, Brook Peterson, Edward S. Goldis	Text Messages	None	None	None	None

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Ex.	Date and Time	Author(s)	Type of Document	Objection to Authenticity	Response to Objection	Objection to Admissibility	Response to Objection
J	12/22/20 12:00 AM	Sheila Peterson	Authorizations	None	None	<p>Basis: FRE 401 and 402.</p> <p>Argument: A compilation of various authorizations signed by Sheila Peterson and dated variously is not relevant to the Issues to be Decided and is, therefore, inadmissible.</p>	<p>Basis: F.R.E. 401,402,404,608.</p> <p>Argument: Disagreed, this exhibit demonstrates re-use of client signatures without knowledge and or consent of clients, firm cut and paste or similar fashion of client signature duplication, avoided contacts with client, issues of notice for consent to settle, ratification matters, and lack of mistake of firm, again, probative to and relates to signature request, authorization, issue of consent or no consent to settlement; issue of client signature duplication avoidance of client contacts or communication, inability to ratify, valid consent issue, relates to important facts of consequence, communications and treatment of Petersons case, absense of mistake, relates to showing Peterson's case argument as more probable and FS as less probable.</p>
K	3/22/24 5:19 PM	Jenna Hough, Edward S. Goldis	Text Messages	None	None	None	None
L	3/15/22 3:14 PM	Wanda Brown Nesmith	Email with No Attachment	None	None	<p>Basis: FRE 401 and 402.</p> <p>Argument: A Feldman Shepherd internal email regarding the receipt of an ambulance bill in March 2022 regarding transport on the day of Brandon Peterson's accident is not relevant to the Issues to be Decided and is, therefore, inadmissible.</p> <p>NOTE - Mr. Thiele has agreed to strike this exhibit but it continues to appear on Plaintiff's exhibit list.</p>	<p>Basis: F.R.E. 401,402,404,608.</p> <p>Argument: Disagreed, probative and relates to important facts of paralegal for firm corresponding with Petersons, both Brook and Sheila regarding matters of consequence, to whom consent could have been conveyed, or action for ratification, and regardidng relates to Petersons having been identified as uncooperative clients, and shows who at firm was communicating with clients, communications and treatment of Petersons case relates to showing Peterson's case argument as more probable and FS as less probable.</p>

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Ex.	Date and Time	Author(s)	Type of Document	Objection to Authenticity	Response to Objection	Objection to Admissibility	Response to Objection
M	8/31/23 4:19 PM	Edward S. Goldis, Jim Girman	Email Chain	None	None	<p>Basis: FRE 401 and 402.</p> <p>Argument: This is a compilation of documents regarding defendant, Murrow's Transfer, Inc.'s Rule 26 initial disclosures in this action, written discovery in this action and insurance coverage documents. Feldman Shepherd objects to the entirety of this exhibit <i>except for</i> the insurance-related affidavit and coverage documents, as well as the policy limits demand letter. The discovery and Rule 26 disclosures are not relevant to the Issues to be Decided and are, therefore, inadmissible.</p>	<p>Basis: F.R.E. 401,402,404,608.</p> <p>Argument: Disagreed, exhibit shows negotatiions for ability for firm to publish results of case for for benefit of firm, failure of disclosure to client regarding matters that would have enabled clients to protest settlement, issues of ratification, and lack of mistake of firm, material settlement matters,probative to dates of notice, communications with Petersons, dishonest and or unrevealing client communications regarding settlement notice, etc., relates to important facts of consequence, communications and treatment of Petersons case relates to showing Peterson's case argument as more probable and FS as less probable.</p>
N	8/15/23 2:57 PM	Edward S. Goldis, Theresa Perri,	Email Chain	None	None	None	None
O	3/14/22 12:54 AM	Cheryl Herling	Feldman Shepherd File Memorandum	None	None	<p>Basis: FRE 401 and 402.</p> <p>Argument: A memorandum from Daniel Mann to the file - in March 2022 - regarding a telephone conversation between Mr. Mann and Edward Ciarimboli, Esquire regarding Murrow's Transfer and the potential use of transportation brokers is not relevant to the Issues to be Decided and is, therefore, inadmissible.</p>	<p>Basis: F.R.E. 401,402, 404,608.</p> <p>Argument: Disagreed, probative to important client communications, matters regarding settlement, other attorney outside firm who had contacts with Mrs. Peterson about defedants, issues of consent for settlement matters material an probative as to why Peterson case settled, and clients told essentially forced to settle by court, lack of mistake, facts for decisions to settle, knowledge of case to give informed consent, and relates to important facts of consequence, communications and treatment of Petersons case, absense of mistake, relates to showing Peterson's case argument as more probable and FS as less probable.</p>

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Ex.	Date and Time	Author(s)	Type of Document	Objection to Authenticity	Response to Objection	Objection to Admissibility	Response to Objection
P	4/7/23 10:37 AM	Edward S. Goldis, Cheryl Herling, Jim Girman	Email Chain	None	None	None	None
Q	9/27/22 12:00 AM	David Orlowski	Orlowski Asset Search	None	None	<p>Basis: FRE 401 and 402.</p> <p>Argument: An introductory letter from Orlowski and Associates to Feldman Shepherd in September 2022 and an asset search report prepared by Orlowski and Associates regarding Murrow's Transfer in November 2022 are not relevant to the Issues to be Decided and are, therefore, inadmissible.</p>	<p>Basis: F.R.E. 401,402,,404, 608</p> <p>Argument: Disagreed, probative to defendant in case valuation issues as relates to ability to give consent, inability to ratify, failure to communicate or inform client of defendant's ability to satisfy judgments, issues of ratification, lack of mistake in not sharing material information with clients, critical material and probative basic information needed for client consent, for express authority, relates to important required, and or needed information to client, and lack thereof disclosures to client regarding settlement, consent to settle, case valuation, authority to settle, and relates to showing Peterson's case argument as more probable and FS as less probable.</p>
R	8/11/23 1:14 PM	Daniel J Mann, Edward S. Goldis, Cheryl Herling	Email Chain	None	None	None	None
S	4/18/23 5:15 PM	Daniel J Mann, Edward S Goldis, Wanda Brown Nesmith	Email Chain	None	None	None	None
T	4/19/23 4:04 PM	Daniel J Mann, Wanda Brown Nesmith, Edward S Goldis	Email Chain	None	None	None	None

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Ex.	Date and Time	Author(s)	Type of Document	Objection to Authenticity	Response to Objection	Objection to Admissibility	Response to Objection
U	3/10/23 4:13 PM	Daniel J Mann, Wanda Brown Nesmith, Theresa Perri	Email Chain	None	None	<p>Basis: FRE 401 and 402.</p> <p>Argument: Feldman Shepherd's internal emails regarding the fact that a legal assistant inadvertently sent the March 10, 2023 policy limits demand letter to James Girman, Esquire with certain highlighting in the letter is not relevant to the Issues to be Decided and is, therefore, inadmissible.</p> <p>This email chain also identifies by name a different Feldman Shepherd client.</p>	<p>Basis: F.R.E. 401,402,404,608.</p> <p>Argument: Disagreed, relates to FS employees and or partners communicating with clients, on important date of attestations to client about future mailing, yet documents were/may have been maile to opposing parties same time, issues of failure to communicate with client for ability for consent, or ratify, issues of express authority, or ratification, ability to consent, express authority matters, relates to important facts of consequence, communications and treatment of Petersons case relates to showing Peterson's case argument as more probable and FS as less probable.</p>
V	3/2/21 3:35 PM	Cheryl Herling	Email Chain	None	None	<p>Basis: FRE 401 and 402.</p> <p>Argument: An email to a Feldman Shepherd investigator - in March 2021 - that attaches an authorization to permit the release of the Coroner's report is not relevant to the Issues to be Decided and is, therefore, inadmissible.</p>	<p>Basis: F.R.E. 401,402,404,608.</p> <p>Argument: Disagreed, probative to needed client communications, dates of communications for approvals of actions, and shows client signature that was re-used by FS, consent matters, and used with mistatement of approval, and or ratification, improper re-use of signature as latter related to communications about settlement, to gov. entities, etc., absense of mistake, relates to important facts of consequence, communications and treatment of Petersons case, relates to showing Peterson's case argument as more probable and FS as less probable.</p>

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Ex.	Date and Time	Author(s)	Type of Document	Objection to Authenticity	Response to Objection	Objection to Admissibility	Response to Objection
W			Murrow's Corporate Documents	None	None	<p>Basis: FRE 401 and 402.</p> <p>Argument: A compilation of corporate formation and related documents regarding defendant, Murrow's Transfer, Inc., is not relevant to the Issues to be Decided and is, therefore, inadmissible.</p>	<p>Basis: F.R.E. 401,402,404,608</p> <p>Argument: Disagreed, probative to who client would be consenting to release, relates to corp. defendant, and parties to settlement, failure to obtain consent, and or mistatements regarding settlement to client, and who not, and how and when to release, needed for authority, and probative to important facts of consequence, communications and treatment of Petersons case, absense of mistake, relates to showing Peterson's case argument as more probable and FS as less probable.</p>
X	3/2/21 10:32 AM	Cheryl Herling, Daniel J. Mann, Wanda Brown Nesmith, Ed Koerper	Email Chain	None	None	<p>Basis: FRE 401 and 402.</p> <p>Argument: An email chain regarding information concerning defendant, Logan Denny in January 2021, Feldman Shepherd's receipt of the PA State Police Crash Report in January 2021, correspondence regarding accident-related information, a discussion of Feldman Shepherd's investigator securing a copy of the coroner's report and photos in March 2021, and internal emails at Feldman Shepherd stating that there are no signed authorizations in the file in March 2021 are not relevant to the Issues to be Decided and are, therefore, inadmissible.</p>	<p>Basis: F.R.E. 401,402,404,608</p> <p>Argument: Disagreed, probative to need and or required client communications, client communications required for consent, later relates to final settlement, and lack of authority, as relates to not giving consent for settlement, and ratification matters, who and what client, and authority for decisions, important dates as relates to important facts of consequence, absense of mistake, communications and treament of Petersons case relates to showing Peterson's case argument as more probable and FS as less probable.</p>
Y	7/27/23 12:00 AM	Alan M. Feldman	Letter	None	None	None	None
Z	6/14/23 11:29 AM	Daniel J. Mann, Theresa Perri	Email Chain	None	None	None	None
AA	4/7/23 11:09 AM	Jim Girman, Edward S. Goldis, Daniel J. Mann	Email Chain	None	None	None	None
BB	4/6/23 11:14 AM	Edward S. Goldis, Daniel J. Mann	Email Chain	None	None	None	None

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Ex.	Date and Time	Author(s)	Type of Document	Objection to Authenticity	Response to Objection	Objection to Admissibility	Response to Objection
CC	3/9/23 12:00 AM		Stipulation Selecting ADR Process	None	None	Basis: FRE 401 and 402. Argument: An as-filed copy of the Court's Stipulation Selecting ADR Process, which was filed on March 9, 2023, is not relevant to the Issues to be Decided and is, therefore, inadmissible.	Basis: F.R.E. 401,402,404,608 Argument: Disagreed, probative to client communications, and lack thereof regarding consent authority, information needed to give consent to settle, issues of no express authority, clients had no knowledge of material facts, knowledge and information required for client decisions, relates to important facts of consequence, absense of mistake, communications and treatment of Petersons caserelates to showing Peterson's case argument as more probable and FS as less probable.
DD	7/28/23 9:29 AM	Edward S. Goldis, Jenna Hough	Email Chain	None	None	None	None
EE	12/23/21 10:58 AM	Edward Ciarimboli	Email	None	None	Basis: FRE 401 and 402. Argument: An email from Edward Ciarimboli, Esquire to Alan Feldman - in December 2021 - attaching a "CAB Report" [Central Analysis Bureau Report] on Murrow's Transfer - is not relevant to the Issues to be Decided and is, therefore, inadmissible.	Basis: F.R.E. 401,402,404,608 Argument: Disagreed, probative to client information, ability to consent, case valuation, and relations of outside and current firm, ability to give consent, and contacts with outside firm to address with current firm about statement in March 10 letter, requirements to settle, question of ratification, when and with what requisite of information for ability to consent or release parties, what parties, etc., relates to important facts of consequence, communications and treatment of Petersons case relates to showing Peterson's case argument as more probable and FS as less probable.
FF	8/15/23 2:53 PM	Daniel J Mann, Sheila Peterson	Email Chain	None	None	None	None
GG	10/22, 12/22, 2/23, 3/23, 4/23, 6/23, 7/23, 8/23	T-Mobile; Sprint	Peterson Redacted Cellnular Phone Bills	None	None	None	None

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Ex.	Date and Time	Author(s)	Type of Document	Objection to Authenticity	Response to Objection	Objection to Admissibility	Response to Objection
HH	8/11/2023 - 8/15/2023	T-Mobile; Sheila Peterson	Notated Call Log	<p>Basis: FRE 901.</p> <p>Argument: A log of Sheila Peterson's cell phone calls to third parties (i.e., calls that were not made to or from Feldman Shepherd) between August 11, 2023 and August 15, 2023, which has been modified and annotated by Sheila Peterson's current lawyers to include the names of the third parties that Sheila Peterson purportedly called lacks authenticity. Absent the testimony of Sheila Peterson's current lawyers, there is no way to authenticate the annotations on the call log. The log is, therefore, inadmissible.</p>		<p>Basis: FRE 401, 402.</p> <p>Argument: A log of Sheila Peterson's cell phone calls to third parties (i.e., calls that were not made to or from Feldman Shepherd) between August 11, 2023 and August 15, 2023, which was modified and annotated by Sheila Peterson's current lawyers to include the names of the third parties that Sheila Peterson purportedly called is not relevant to the issues to be decided and is, therefore, inadmissible.</p>	<p>Basis: F.R.E. 401,402,404,608</p> <p>Argument: Disagreed, probative to clients contacting gov. and bar agencies seeking help to not settle, and communications from prior firm to client / regarding their FS client needing help regarding FS communication, not understanding settlement, inability to rely and or trust, ability to timely act regarding settlement authority matters, and or needed urgent actions, and relates to important facts of consequence, absense of mistake, communications and treatment of Petersons case relates to showing Peterson's case argument as more probable and FS as less probable.</p>
II	8/20/2023 (capture date)		Feldman Shepherd Website Announcement	None	None	None	None
JJ	3/9/23 12:00 AM	Mark A. Martini	Letter - State Farm Underinsured Motorist Coverage	None	None	None	None
KK	8/10/23 5:36 PM	Daniel J. Mann, Sheila Peterson	Email Chain	None	None	None	None
LL	3/22/23 4:17 PM	Jenna Hough	Email Chain	None	None	None	None
MM	5/31/23 2:43 AM	Jenna Hough, Daniel J. Mann, Edward S. Goldis, Theresa Perri	Email Chain	None	None	None	None
NN	8/2/23 12:00 AM	Mark A. Martini	Memo and Draft Affidavit	None	None	None	None

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Ex.	Date and Time	Author(s)	Type of Document	Objection to Authenticity	Response to Objection	Objection to Admissibility	Response to Objection
OO	4/19/23 12:00 AM	Jenna Hough	Letter - Authorization	None	None	<p>Basis: FRE 401 and 402.</p> <p>Argument: A letter from Jenna Hough, a Feldman Shepherd paralegal, dated April 19, 2023 to the Pennsylvania Department of Human Services seeking to confirm that DHS has no interest in the settlement of the case and asking DHS to respond indicating if DHS has any claim regarding the Estate is not relevant to the Issues to be Decided and is, therefore, inadmissible.</p>	<p>Basis: F.R.E. 401,402,404,608</p> <p>Argument: Disagreed, probative to needed client communications, re-use of client signature supporting document stating settlement reached, material issues of no consent, and or avoiding client communications for issues of consent and or ratification, firm avoiding opportunities for ratification, dates of communications for approvals of actions, and issues of settlement as regard client consent, client signature request, when, how, where, by FS, issues of re-use of signature as latter related to communications about settlement, to gov. entities, etc., absense of mistake, relates to important facts of consequence, communications and treatment of Petersons case relates to showing Peterson's case argument as more probable and FS as less probable.</p>

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Ex.	Date and Time	Author(s)	Type of Document	Objection to Authenticity	Response to Objection	Objection to Admissibility	Response to Objection
PP	11/18/21 4:06 PM	Wanda Brown Nesmith, Cheryl Herling, Daniel J. Mann	Email Chain	None	None	Basis: FRE 401 and 402. Argument: Internal Feldman Shepherd emails - from November 2021 - regarding the signature and notary requirements for an authorization for Brandon Peterson's cell phone records and whether the Petersons were cooperating with Feldman Shepherd at that time are not relevant to the Issues to be Decided and are, therefore, inadmissible.	Basis: F.R.E. 401,402,404,608 Argument: Disagreed, Probative as to firm action to notarize and or validate client signature without client involvement, identifies clients as not cooperative, and material and probative to lack of consent, no authority to settle, issues regarding firm actions with clients, re settlement and ratification, identifying and having notice of client communication matters, FS identifies Petersons as non-cooperative, relevant to how, when, where and why settlement communications were important for release communications and consent, also relates to other important facts of consequence, absense of mistake, communications and treatment of Petersons caserelates to showing Peterson's case argument as more probable and FS as less probable.
QQ	1/2/21 7:50 PM	Edward S. Goldis, Alan Feldman	Email Chain	None	None	None	None


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Ex.	Date and Time	Author(s)	Type of Document	Objection to Authenticity	Response to Objection	Objection to Admissibility	Response to Objection
RR	11/19/21 9:47 AM	Edward S. Goldis, Daniel J Mann, Wanda Brown Nesmith	Email Chain	None	None	Basis: FRE 401 and 402. Argument: Internal Feldman Shepherd emails - from November 2021 - regarding the signature and notary requirements for an authorization for Brandon Peterson's cell phone records and whether the Petersons were cooperating with Feldman Shepherd at that time are not relevant to the Issues to be Decided and are, therefore, inadmissible.	Basis: F.R.E. 401,402,404,608 Argument: Disagreed, again, probative as to firm identifying and having notice of client communication matters, FS identifies Petersons as non-cooperative, relevant to how, when, where and why settlement communications were important for release communications and consent, matters of communicating with clients to obtain settlement authority, and or ratify agreement, relates to important facts of consequence, communications and treatment of Petersons case, absense of mistake, relates to showing Peterson's case argument as more probable and FS as less probable.

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Ex.	Date and Time	Author(s)	Type of Document	Objection to Authenticity	Response to Objection	Objection to Admissibility	Response to Objection
SS		Pittsburgh Action News 4	 Driver Called to Crash Rt. 119 (News 4 Pittsburgh).mpg	None	None	<p>Basis: FRE 401, 402 and 802.</p> <p>Argument: A News 4 Pittsburgh video news report regarding Brandon Peterson's accident and community reaction is not relevant to the Issues to be Decided and is, therefore, inadmissible.</p> <p>If the video news report is offered for the truth of the statements in the video, then the video is also inadmissible hearsay because the statements in the video are not subject to any hearsay exceptions.</p>	<p>Basis: F.R.E. 401,402,404,608,803</p> <p>Argument: Disagreed, probative to the understanding of the underlying facts, as it relates to what occurred to start the case, and the scope and magnitude of settlement, closure, and the need for who, how, when and where the facts occurred, liability ensured, and the understanding requirement for communications to client, to obtain authority, express consent matters, as relates to important facts of consequence, communications and treatment of Petersons case, relates to showing Peterson's case argument as more probable and FS as less probable. Also, this exhibit qualifies under exceptions to the hearsay rule as will be further set forth in reply, including, not provided for the truth of the matters asserted, and not hearsay argument</p>
TT	12/13/23 12:00 AM	Ryan H. James	Written Report of Ryan H. James, Esquire	None	None	This exhibit is the subject of Feldman Shepherd's Motion in Limine No. 2.	See Plaintiff' Response to Feldman Shepherd's Motion in Limine No. 2.
UU	12/13/23 12:00 AM	Ryan H. James	Ryan James CV	None	None	This exhibit is the subject of Feldman Shepherd's Motion in Limine No. 2.	See Plaintiff' Response to Feldman Shepherd's Motion in Limine No. 2.

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Ex.	Date and Time	Author(s)	Type of Document	Objection to Authenticity	Response to Objection	Objection to Admissibility	Response to Objection
VV	12/13/23 7:42 AM	Edward Ciarimboli, Sheila Peterson	Email Chain	None	None	Basis: FRE 401 and 402. Argument: Sheila Peterson's email communications with Edward Ciarimboli, Esquire regarding potential representation shortly after the accident in January 2021 and prior to Sheila Peterson and Brook Peterson's retention of Feldman Shepherd on January 5, 2021 are not relevant to the Issues to be Decided and are, therefore, inadmissible.	Basis: F.R.E. 401,402,404,608 Argument: Disagreed, material and probative to firm notice of terms for fee agreement, and cost and contract terms, discussions during contract signing at time of signing fee agreement, material to terms and fees of dispute, FS client, pre/post client communications, etc., state of mind, understanding, approval of, and or negotiations terms and conditions, dates of communications, for approval of actions, express authority matters, relates to important facts of consequence, communications, pre/during/post client rep agreement communications, absense of mistake, showing Peterson case more probable and FS case less probable.
WW	5/22/23 5:23 PM	Alan Feldman, Daniel Mann, Edward Goldis, Jenna Hough	Email Chain	None	None	None	None
XX	4/5/23 2:51 PM	Alan Feldman, Daniel Mann	Email Chain	None	None	None	None

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Ex.	Date and Time	Author(s)	Type of Document	Objection to Authenticity	Response to Objection	Objection to Admissibility	Response to Objection
YY	8/14/2023 4:26:00 PM (based upon review of 18/14/2023 email exchange between Alan Feldman and Edward Ciarimboli)	Edward Ciarimboli	Text Messages	None	None	Basis: FRE 401 and 402. Argument: A text from Edward Ciarimboli to Sheila Peterson in August 2023 declining to provide legal advice to Sheila Peterson in light of her being represented at that time by Feldman Shepherd is not relevant to the Issues to be Decided and is, therefore, inadmissible.	Basis: F.R.E. 401,402,404,608 Argument: Disagreed, probative as relates to other exhibits and testimony of other cases against defendant, and or settlement authority, and information for ability to settle, and or ratifiy agreement, relates to firms prior client seeking help from other attorney who had reviewed case prior to firm being retained, relates to timing of Petersons contacting gov. agencies for help, /and contacting nongovernmental agencies for help, and enforcement agencies for help, to firm identifying and having notice of client communication matters, absence of mistake, other client communication matters, relevant, material and probative to how, what, when, where and why retention of legal services and settlement communications, and how occurred, relates to relevant evidence and facts of consequence, client and multiple firm communications and multiple firm relations, knowledge of or pertaining to defendant matters, relates to showing Petersons case arguments as more probable and FS arguments as less probable.